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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUL 10 2008

MAGISTRATE JUDGE JEFFREY COLE
UNITED STATES DISTRICT COURT

JUDGE GOTTSCHALL

UNITED STATES OF AMERICA

) No. 08 CR 388

v.

) Violations: Title 18, United States
) Code, Sections 922(g)(5)(A),

JESUS IVAN VAZQUEZ-RAMIREZ, and
CARLOS BELTRAN

) 924(c)(1)(A), and 2, and Title 21,
) United States Code, Sections
) 841(a)(1) and 846.

COUNT ONE

MAGISTRATE JUDGE ASHMAN

The SPECIAL FEBRUARY 2008-2 GRAND JURY charges:

On or about May 13, 2008, at Berwyn, in the Northern District of Illinois, Eastern Division,
and elsewhere,

JESUS IVAN VAZQUEZ-RAMIREZ, and
CARLOS BELTRAN,

defendants herein, conspired and agreed with each other knowingly and intentionally to possess with
intent to distribute controlled substances, namely, 500 grams or more of cocaine, a Schedule II
Narcotic Drug Controlled Substance, and 1 kilogram or more of heroin, a Schedule I Narcotic Drug
Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL FEBRUARY 2008-2 SPECIAL GRAND JURY further charges:

On or about May 13, 2008, at Berwyn, in the Northern District of Illinois, Eastern Division,

JESUS IVAN VAZQUEZ-RAMIREZ, and
CARLOS BELTRAN,

defendants herein, did knowingly and intentionally possess with intent to distribute controlled substances, namely, 500 grams or more of cocaine, a Schedule II Narcotic Drug Controlled Substance, and 1 kilogram or more of heroin, a Schedule I Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL FEBRUARY 2008-2 SPECIAL GRAND JURY further charges:

On or about May 13, 2008, at Berwyn, in the Northern District of Illinois, Eastern Division,

JESUS IVAN VAZQUEZ-RAMIREZ, and
CARLOS BELTRAN,

defendants herein, knowingly possessed firearms, namely, a Lorcin L22 .22 caliber handgun, bearing serial number 100333, and a 12 gauge Savage shotgun, bearing serial number D500070, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, violations of Title 21, United States Code, Sections 846 and 841, as further set forth in Counts One and Two of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FOUR

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

On or about May 13, 2008, at Berwyn, in the Northern District of Illinois, Eastern Division,

JESUS IVAN VAZQUEZ-RAMIREZ,

defendant herein, being an alien who was illegally and unlawfully in the United States, knowingly possessed a firearm, namely, a Lorcin L22 .22 caliber handgun, bearing serial number 100333, which firearm was in and affecting interstate commerce in that it had traveled in interstate commerce prior to the defendant's possession of it;

In violation of Title 18, United States Code, Section 922(g)(5)(A).

FORFEITURE ALLEGATION ONE

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The allegations of Counts One and Two of this Indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violation of Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in the foregoing Indictment,

JESUS IVAN VAZQUEZ-RAMIREZ, and
CARLOS BELTRAN,

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds obtained, directly and indirectly, as a result of the violations; and (2) any and all of property used, and intended to be used, in any manner or part, to commit and facilitate the commission of the violations.

3. The interests of the defendants, subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, include, but are not limited to, the following:

\$1,162,780 in United States Currency

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendants under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION TWO

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The allegations contained in Counts Three and Four of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. As a result of the violations by defendants JESUS IVAN VAZQUEZ-RAMIREZ and CARLOS BELTRAN of Title 18, United States Code, Section 924(c)(1)(A) as alleged in Count Three of the foregoing Indictment, and the violation by defendant VAZQUEZ-RAMIREZ of Title 18, United States Code, Section 922(g)(5)(A) as alleged in Count Four of the foregoing Indictment,

JESUS IVAN VAZQUEZ-RAMIREZ, and
CARLOS BELTRAN,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offense.

3. The property of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), is:

One Lorcin L22 .22 caliber handgun, serial number 100333;

Two loaded magazines for a Lorcin L22;

12 gauge Savage shotgun, serial number D500070.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY